

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
John B. Quinn (Bar No. 90378)
johnquinn@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017-2543
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Morgan W. Tovey (Bar No. 136242)
morgantovey@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, California 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Corey Worcester (Admitted *pro hac vice*)
coreyworcester@quinnemanuel.com
Stefan Berthelsen (Admitted *pro hac vice*)
stefanberthelsen@quinnemanuel.com
295 Fifth Avenue, 9th Floor
New York, New York 10016
Telephone: (212) 849-7000
Facsimile: (212) 849 -7100

Attorneys for Plaintiff Reddit, Inc.

MORRISON & FOERSTER LLP
Ragesh K. Tangri (CA SBN 159477)
RTangri@mofo.com
Adam Brausa (CA SBN 298754)
ABrausa@mofo.com
425 Market Street,
San Francisco, California 94105-2482
Telephone: 415.268.7000
Facsimile: 415.268.7522

Whitney R. O'Byrne (CA SBN 325698)
WOByrne@mofo.com
Laura Lively Babashoff (CA SBN 323922)
LLively@mofo.com
Katherine E. McNutt (CA SBN 320128)
KMcNutt@mofo.com
707 Wilshire Boulevard, Suite 6000
Los Angeles, California 90017-3543
Telephone: 213.892.5200
Facsimile: 213.892.5454

**Counsel continued on subsequent page*

Attorneys for Defendant Anthropic PBC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

REDDIT, INC.,

Plaintiff,

v.

ANTHROPIC PBC,

Defendant.

Case No. 3:25-cv-05643-TLT

**JOINT CASE MANAGEMENT
STATEMENT**

Date: December 18, 2025
Time: 2:00 p.m.
Courtroom: 9, 19th Floor
Judge: Hon. Trina L. Thompson

1 MORRISON & FOERSTER LLP
Quinn V. Walker (CA SBN 336266)
2 QWalker@mofo.com
2100 L Street, NW Suite 900
3 Washington, DC 20037
Telephone: 202.887.1500
4 Facsimile: 202.887.0763

5 CONRAD METLITZKY KANE LLP
Grace Yang (CA SBN 286635)
6 gyang@conmetkane.com
217 Leidesdorff Street
7 San Francisco, CA 94111
Telephone: 415.469.1715

8 *Attorneys for Defendant Anthropic PBC*
9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Pursuant to Federal Rule of Civil Procedure 16, Civil Local Rules 16-9 and 16-10, the Standing Order for All Judges of the Northern District of California, and in advance of the Initial Case Management Conference set by the Court for Thursday, December 18, 2025, at 2:00 p.m., Plaintiff Reddit, Inc. (“Plaintiff” or “Reddit”) and Defendant Anthropic PBC (“Defendant” or “Anthropic”), (together, the “Parties”) respectfully submit this Joint Case Management Statement.

I. JURISDICTION AND SERVICE

Plaintiff’s statement: As set forth in more detail in Plaintiff’s motion to remand (ECF. No. 19, re-noticed at ECF No. 33), Plaintiff disputes that this Court has subject matter jurisdiction over Plaintiff’s claims. Plaintiff, a California corporate resident, originally—and properly—filed its Complaint against another California corporate resident, Defendant Anthropic, in San Francisco Superior Court alleging solely state-law causes of action. As such, there is neither diversity nor federal question jurisdiction. Nonetheless, Anthropic filed its removal petition on July 3, 2025, arguing that *most*, but not all, of Plaintiff’s state-law claims are preempted by the Copyright Act. ECF No. 2.

Anthropic is attempting to manufacture a basis for federal jurisdiction by misconstruing both Reddit’s state law causes of action and controlling law regarding when federal preemption serves a basis for removal jurisdiction (as opposed to an affirmative defense). As Reddit’s Complaint makes clear, the core allegations in this case are that Anthropic breached its contract with Reddit and through its actions interfered with Reddit’s ability to perform under its agreement with its users—these are matters of California contract and tort common law, not federal copyright. Anthropic has not met, nor can it meet, its burden of demonstrating that this is one of the “rare” and “extraordinary” cases in which *complete preemption*—a basis for removal jurisdiction—applies. *See ARCO Env’t Remediation, L.L.C. v. Dep’t of Health & Env’t Quality of Montana* 213 F.3d 1108, (9th Cir. 2000); *Metropolitan Life Ins. Co. v. Taylor*, 481 U.S. 58, 63–64 (1987). Anthropic’s failure to satisfy its heavy burden of proof and rebut the “strong presumption against removal” is dispositive. *Gaus v. Miles, Inc.*, 980 F.2d 564, 566 (9th Cir. 1992).

Plaintiff’s motion to remand is set to be heard before this Court on January 27, 2026.

1 Defendant’s statement: The essence of Reddit’s Complaint is that Anthropic allegedly
 2 copied user-generated content from Reddit’s platform without paying licensing fees to Reddit.
 3 (ECF No. 24). That is a quintessential copyright claim. Reddit cannot bring that claim because it
 4 does not actually hold any copyrights in the content at issue. Instead, Reddit attempted to evade
 5 this restriction by artfully pleading its copyright-like claims in contract and tort. But these mere
 6 labels do not and cannot change the gravamen of Reddit’s suit or the proper forum for it.

7 Courts in this circuit have consistently found state law claims completely preempted where
 8 they do not implicate rights that are qualitatively different from those protected by the Copyright
 9 Act. *See, e.g., Best Carpet Values, Inc. v. Google, LLC*, 90 F.4th 962, 972-74 (9th Cir. 2024);
 10 *Andersen v. Stability AI Ltd.*, 744 F. Supp. 3d 956, 972, 984-85 (N.D. Cal. 2024); *Yu v. ByteDance*
 11 *Inc.*, No. 23-cv-03503-SI, 2023 WL 5671932, at *6-7 (N.D. Cal. Sept. 1, 2023); *United Fabrics*
 12 *Int’l Inc. v. J.C. Penny Corp., Inc.*, No. CV 08-01936-MMM (PJWx), 2008 WL 11337642, at *6-
 13 8 (C.D. Cal. July 21, 2008). The majority of Reddit’s claims fit this mold: its claims for breach of
 14 contract, unjust enrichment, and tortious interference, as well as most of its unfair competition
 15 claim, fundamentally implicate core rights granted by copyright law, with no substantive “extra
 16 elements.” The remaining claims that are not preempted, trespass to chattels and unfair competition
 17 premised on the same, arise from the same common nucleus of operative facts, and the Court
 18 therefore can and should exercise supplemental jurisdiction. The Court therefore has jurisdiction
 19 over Reddit’s claims.

20 **II. FACTS**

21 Plaintiff’s Statement: Reddit alleges that as far back as December 2021, Anthropic—
 22 without authorization and in direct violation of Reddit’s User Agreement and Privacy Policies—
 23 systematically scraped and commercialized Reddit content to train its AI chatbot, *Claude*. ECF
 24 No. 1-1 at ¶ 7. As a result of Anthropic’s unauthorized access and scraping, Reddit’s state-law
 25 Complaint asserts five causes of action under California contract and tort law: (1) breach of
 26 contract, (2) unjust enrichment, *pled in the alternative*, (3) trespass to chattels; (4) tortious
 27 interference with a contractual relationship; and (5) unfair competition under California Business
 28 & Professions Section 17200. *See id.* at ¶¶ 64-96.

1 Defendant's Statement: Anthropic disputes the allegations underlying Reddit's five state-
 2 law causes of action. For example, Anthropic's access of Reddit was not unauthorized, not
 3 violative of any valid agreement, not unjust, not a trespass, not tortious, and not unfair competition
 4 under Section 17200. Anthropic agrees that Reddit's complaint asserts the five enumerated causes
 5 of action. Anthropic denies that Reddit is entitled to any relief.

6 **III. LEGAL ISSUES**

7 The Parties identify the following disputed points of law based on the current pleadings and
 8 pending motion to remand:

- 9 • Whether Reddit's state-law claims are subject to complete preemption under the
 10 Copyright Act such that this Court can properly exercise jurisdiction;
- 11 • Whether Reddit's state-law claims are subject to conflict preemption relating to the
 12 Copyright Act;
- 13 • Whether Reddit has adequately alleged each of its claims;
- 14 • Whether Anthropic was subject to and breached Reddit's User Agreement under
 15 California common law;
- 16 • Whether Anthropic was unjustly enriched under California common law;
- 17 • Whether Anthropic unlawfully trespassed on Reddit's electronic chattels under
 18 California common law;
- 19 • Whether Anthropic tortiously interfered with valid contractual relationships between
 20 Reddit and its users under California common law;
- 21 • Whether Anthropic violated California's Unfair Competition Law under Cal. Bus. &
 22 Prof. Code Section 17200;
- 23 • Whether Reddit is entitled to remedies sought in its Prayer for Relief, including: specific
 24 performance; compensatory, consequential, and punitive damages; lost profits and/or
 25 disgorgement; restitution; pre- and post-judgment interest; attorneys' fees and costs; and
 26 injunctive relief;
- 27 • Whether Anthropic is entitled to attorneys' fees and/or costs.

IV. MOTIONS***Pending Motions***

Plaintiff's motion to remand is currently pending before this Court. ECF No. 19, Re-Noticed at ECF No. 33. It is set to be heard on January 27, 2026 at 2:00 p.m. There are no other pending motions.

Anticipated Motions

Defendant anticipates filing a motion to dismiss Plaintiff's Complaint once Plaintiff's motion to remand is decided. By stipulation and Court order, Defendant's opening brief in support of any such motion is due fourteen (14) days after Plaintiff's motion to remand is decided. ECF No. 14, pp. 3, 5.

V. AMENDMENT OF PLEADINGS

The Court has not yet heard Plaintiff's motion to remand, and Defendant has not yet filed any responsive pleading. Plaintiff reserves its right to file an amended complaint should the case remain in this venue and if warranted by either Defendant's responsive pleading or order of the Court. The Parties anticipate conducting fact and expert discovery, which may lead to adding parties, claims, and/or defenses. As additional relevant facts are discovered, Plaintiff may seek leave to amend its Complaint consistent with Fed. R. Civ. P. 15.

VI. EVIDENCE PRESERVATION

The Parties have reviewed the Guidelines Relating to the Discovery of Electronically Stored Information, are aware of their document preservation obligations, and have taken reasonable and proportionate steps to preserve evidence potentially relevant to the issues in this action.

If this action remains in this Court and progresses to discovery, the Parties will meet and confer regarding a stipulated protocol governing the form of production of ESI and stipulate to a joint proposed ESI order within a reasonable amount of time upon the commencement of fact discovery.

VII. DISCLOSURES

No disclosures have occurred to date. The Parties have agreed to a case schedule, set forth below, that sets forth the deadlines for required disclosures to occur.

1 **VIII. DISCOVERY**

2 No formal discovery has been taken to date. To preserve resources and in the interests of
 3 efficiency, the Parties have agreed not to serve discovery until after Plaintiff's motion to remand is
 4 decided. The Parties have agreed to a case schedule, set forth below, that accounts for this
 5 agreement and will allow discovery to proceed in a timely fashion.

6 **IX. CLASS ACTIONS**

7 Not applicable.

8 **X. RELATED CASES**

9 Neither party is aware of any related cases pending before any other court.

10 **XI. RELIEF**

11 Plaintiff seeks the following relief:

- 12 • Specific Performance, compensatory damages, consequential damages, lost profits,
 13 and/or disgorgement of Anthropic's profits;
- 14 • An injunction prohibiting Anthropic from continuing to use any Reddit data or
 15 content in support of its commercial offerings and from continuing to profit from
 16 any commercial offerings built with the aid of Reddit content, including by
 17 prohibiting Anthropic from continuing to license or sell any products that
 18 incorporate data or were trained using data from the Reddit platform in any way;
- 19 • Restitution for the amount by which Anthropic has been enriched by its scraping
 20 and use of Reddit content;
- 21 • Pre-judgment and post-judgment interest as allowed by law;
- 22 • Punitive damages as allowed by law;
- 23 • An award of attorneys' fees and costs as allowed by law; and
- 24 • Any other relief the Court deems appropriate.

25 Defendant denies that Plaintiff is entitled to any relief and seeks the following relief:

- 26 • An award of attorneys' fees and/or costs as allowed by law; and
- 27 • Any other relief the Court deems appropriate.

XII. SETTLEMENT AND ADR

The Parties engaged in a formal mediation through JAMS on August 1, 2025, and were not able to reach a resolution. The Parties do not believe another ADR is appropriate at this time, but will reconsider the appropriateness and timing of a subsequent ADR upon resolution of the motion to remand, any motion(s) to dismiss, and the commencement of fact discovery.

XIII. OTHER REFERENCES

At this time, the parties do not believe this case is suitable for reference to binding arbitration, a special master, or the Judicial Panel on Multidistrict Litigation. It is premature to know whether referral to a special master is appropriate, but the parties reserve the right to request any such referral under appropriate circumstances.

XV. NARROWING OF ISSUES

At this time, the Parties believe it is premature to suggest narrowing of issues. Upon resolution of the motion to remand and any motion(s) to dismiss, the Parties will discuss whether any of the issues can be narrowed by agreement or motion, as well as potential means to expedite the presentation of evidence at trial.

XVI. SCHEDULING

The Parties have agreed upon, and propose, the following schedule:

Date	Event
December 18, 2025	Case Management Conference
January 27, 2026	Remand motion hearing
February 27, 2026	Initial disclosures exchanged
February 27, 2026	Proposed ESI submission
December 18, 2026	Close of fact discovery
January 18, 2027	Final deadline to file discovery motions
February 1, 2027	Opening Expert Reports on issues on which party bears burden of proof
March 22, 2027	Rebuttal Expert Reports
April 19, 2027	Reply Expert Reports

Date	Event
May 17, 2027	Expert Discovery closes
June 7, 2027	Daubert motion filing deadline
June 7, 2027	Deadline for dispositive motions
July 5, 2027	Deadline for opposition to Daubert motions
July 5, 2027	Deadline for opposition to dispositive motions
July 19, 2027	Deadline for reply re Daubert motions
July 19, 2027	Deadline for reply re dispositive motions
August 23, 2027	Daubert motion hearing deadline
August 23, 2027	Hearing date for dispositive motions
October 4, 2027	Joint Pretrial Statement
November 1, 2027	Pretrial Conference
December 6, 2027	Trial, subject to the Court's availability

XVII. TRIAL

Plaintiff has requested a jury trial. The Parties currently estimate trial will last two weeks, but will advise the Court if that estimate changes after discovery.

XVIII. DISCLOSURE OF NON-PARTY INTERESTED ENTITIES OR PERSONS

Reddit filed its disclosure pursuant to Fed. R. Civ. P. 7.1 and its Certification of Interested Entities or Persons required by Civil Local Rule 3-15 on October 1, 2025 (ECF No. 32). Reddit confirms pursuant to Civil L.R. 3-15 that as of this date, there is no conflict or interest (other than the named parties) to report.

Anthropic filed its disclosure pursuant to Fed. R. Civ. P. 7.1 and its Certification of Interested Entities or Persons required by Civil Local Rule 3-15 on July 3, 2025 (ECF No. 3).

Anthropic confirms pursuant to Civil L.R. 3-15 that as of this date, there is no conflict or interest (other than the named parties) to report.

XIX. PROFESSIONAL CONDUCT

All attorneys of record have reviewed the Guidelines for Professional Conduct for the Northern District of California.

XXI. OTHER ISSUES

Pursuant to Fed. R. Civ. P. 5(b)(2)(E), the Parties consent to electronic service of documents, including discovery materials and correspondence, that are not filed with the Court, and that electronic service be treated as hand service.

DATED: December 10, 2025

Respectfully submitted,

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

/s/ Corey Worcester

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

John B. Quinn (Bar No. 90378)

johnquinn@quinnemanuel.com

865 South Figueroa Street, 10th Floor

Los Angeles, California 90017-2543

Telephone: (213) 443-3000

Facsimile: (213) 443-3100

Morgan W. Tovey (Bar No. 136242)

morgantovey@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Corey Worcester (Admitted *pro hac vice*)

coreyworcester@quinnemanuel.com

Stefan Berthelsen (Admitted *pro hac vice*)

stefanberthelsen@quinnemanuel.com

295 Fifth Avenue, 9th Floor

New York, New York 10016

Telephone: (212) 849-7000

Facsimile: (212) 849 -7100

Attorneys for Plaintiff Reddit, Inc.

/s/ Adam Brausa

MORRISON & FOERSTER LLP

Ragesh K. Tangri (CA SBN 159477)

RTangri@mofo.com

Adam Brausa (CA SBN 298754)

ABrausa@mofo.com

425 Market Street,

San Francisco, California 94105-2482

Telephone: 415.268.7000

Facsimile: 415.268.7522

Whitney R. O'Byrne (CA SBN 325698)

WObyrne@mofo.com

Laura Lively Babashoff (CA SBN 323922)

LLively@mofo.com

Katherine E. McNutt (CA SBN 320128)

KMcNutt@mofo.com

707 Wilshire Boulevard, Suite 6000

Los Angeles, California 90017-3543

Telephone: 213.892.5200

Facsimile: 213.892.5454

Quinn V. Walker (CA SBN 336266)

QWalker@mofo.com

2100 L Street, NW Suite 900

Washington, DC 20037

Telephone: 202.887.1500

Facsimile: 202.887.0763

CONRAD METLITZKY KANE LLP

Grace Yang (CA SBN 286635)

gyang@conmetkane.com

217 Leidesdorff Street

San Francisco, CA 94111

Telephone: 415.469.1715

Attorneys for Defendant Anthropic PBC

Attestation Pursuant to Civil Local Rule 5-1(h)(3)

Pursuant to Local Rule 5-1(h)(3), I hereby attest that all other signatories listed, and on whose behalf this filing is jointly submitted, concur in this filing's content and have authorized me to file this document.

Dated: December 10, 2025

/s/ Corey Worcester

Corey Worcester